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January 14, 2022

The Honorable Richard M. Berman
United States District Judge
United states District Court
Southern District of New York
United States Courthouse
500 Pearl St.
New York, NY 10007-1312
-Via ECF-

Re: USA v. Modesto Arias-Soto
19 Cr. 553 (RMB)

Dear Judge Berman,

Our office represents Mr. Modesto Arias-Soto in the above captioned matter.

Mr. Arias-Soto has been suspended from work, pending the renewal of his Green Card/Legal Permanent Resident status. He has an appointment at USCIS on February 8, 2022, to process his application.

We respectfully request the Bail Conditions modifications below, to allow him to renew his status and continue to work:

1) A Bail Conditions modification to allow for the renewal of travel document--Dominican Passport, and his Green Card;

2) A Bail Conditions modification to allow the temporarily return his expired Dominican Passport for three weeks, from January 19, 2022 to February 9, 2022, to renew it and present it at his USCIS appointment.

As soon as Mr. Arias-Soto renews his passport and Green Card by February 9, 2022, he will surrender both the expired and the new Dominican Passports to U.S. Pretrial Services.

U.S. Pretrial Services Officer Marlon Ovalles has no objections to these bail modifications. The Government, by way of A.U.S.A. Ni Qian, has no objections.

Thank you for your consideration to this matter.

Application granted on consent of
Pretrial Services and the US Attorney's
Office.

SO ORDERED:
Date: 1/14/2022


Richard M. Berman
Richard M. Berman, U.S.D.J.

Sincerely,

S/Telesforo Del Valle Jr.
Telesforo Del Valle Jr., Esq.
Attorney for Defendant,
Modesto Arias Soto